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Federal Communications Commission
Office of Secretary

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December 1, 1997

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Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

In re: XYPOINT Corporation
CC Docket 94-102
Ex Parte Communication

Dear Ms. Salas:

On November 26, 1997, representatives of XYPOINT Corporation met with John Cimko and Ron Netro of the Wireless Telecommunications Bureau regarding issues related to the above-referenced proceeding. In a November 26, 1997 letter XYPOINT filed with the Commission as required by the ex parte rules, the Commission was advised that additional materials were given to Mr. Cimko at the meeting which would be submitted for the record as soon as they could be reproduced. Accordingly, there is attached hereto two copies of the materials provided to Mr. Cimko at the November 26, 1997 meeting which were not submitted in the record on that date.

Respectfully submitted,

David C. Jatlow
Counsel for XYPOINT Corporation

cc: John Cimko
Ron Netro

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List ABCDE

PLAN FOR INTEGRATING CELLULAR 9-1-1 SERVICE INTO THE ENHANCED 9-1-1 NETWORK IN THE METROPOLITAN AREA

Minnesota Statutes 403.08, Subdivision 7 requires Admin to develop a plan, by October 1, 1997, for integrating wireless 9-1-1 into the enhanced 9-1-1 network in the Metropolitan area, and enter into contracts with the 9-1-1 service provider and wireless access service providers to implement phase I of the FCC order on providing enhanced 9-1-1 for wireless subscribers.

Three methods of integrating wireless 9-1-1 into the enhanced 9-1-1 network were considered, and the Feature Group D option was chosen as the only proven, least expensive, viable option. Contracts were sent to the five wireless access providers in Metro, asking for implementation as quickly as possible.

MINNESOTA WIRELESS 9-1-1 LAW

Each cellular and other wireless access service provider cooperate in planning and implementing integration with enhanced 9-1-1 systems operating in their service territories to meet Federal Communications Commission (FCC) enhanced 9-1-1 standards.

Each 9-1-1 emergency telephone service provider operating enhanced 9-1-1 systems, in cooperation with each involved cellular or other wireless access service provider, to develop and provide to the commissioner good-faith estimates of installation and recurring expenses to integrate cellular 9-1-1 service into the enhanced 9-1-1 networks to meet FCC Phase I wireless enhanced 9-1-1 standards by August 1, 1997.

The Department of Administration to coordinate with counties and affected public safety agency representatives in developing a statewide design and plan for implementation.

Planning to be completed by October 1, 1997, for the metropolitan area and by December 1, 1997, for the areas outside of the metropolitan area.

Planning considerations to include cost, degree of integration into existing 9-1-1 systems, the retention of existing 9-1-1 infrastructure, and the potential implications of phase 2 of the FCC wireless enhanced 9-1-1 standards.

Counties to incorporate the statewide design when modifying county 9-1-1 plans to provide for integrating wireless 9-1-1 service into existing county 9-1-1 systems.

The Commissioner of Administration to contract with the involved wireless access service providers and 9-1-1 service providers to integrate cellular and other wireless services into existing 9-1-1 systems where feasible.

Metro was our first priority; about 80% of the 33,000 wireless 9-1-1 calls per month are in Metro. Information was requested from U S West, the 9-1-1 service provider, and the five wireless access providers.

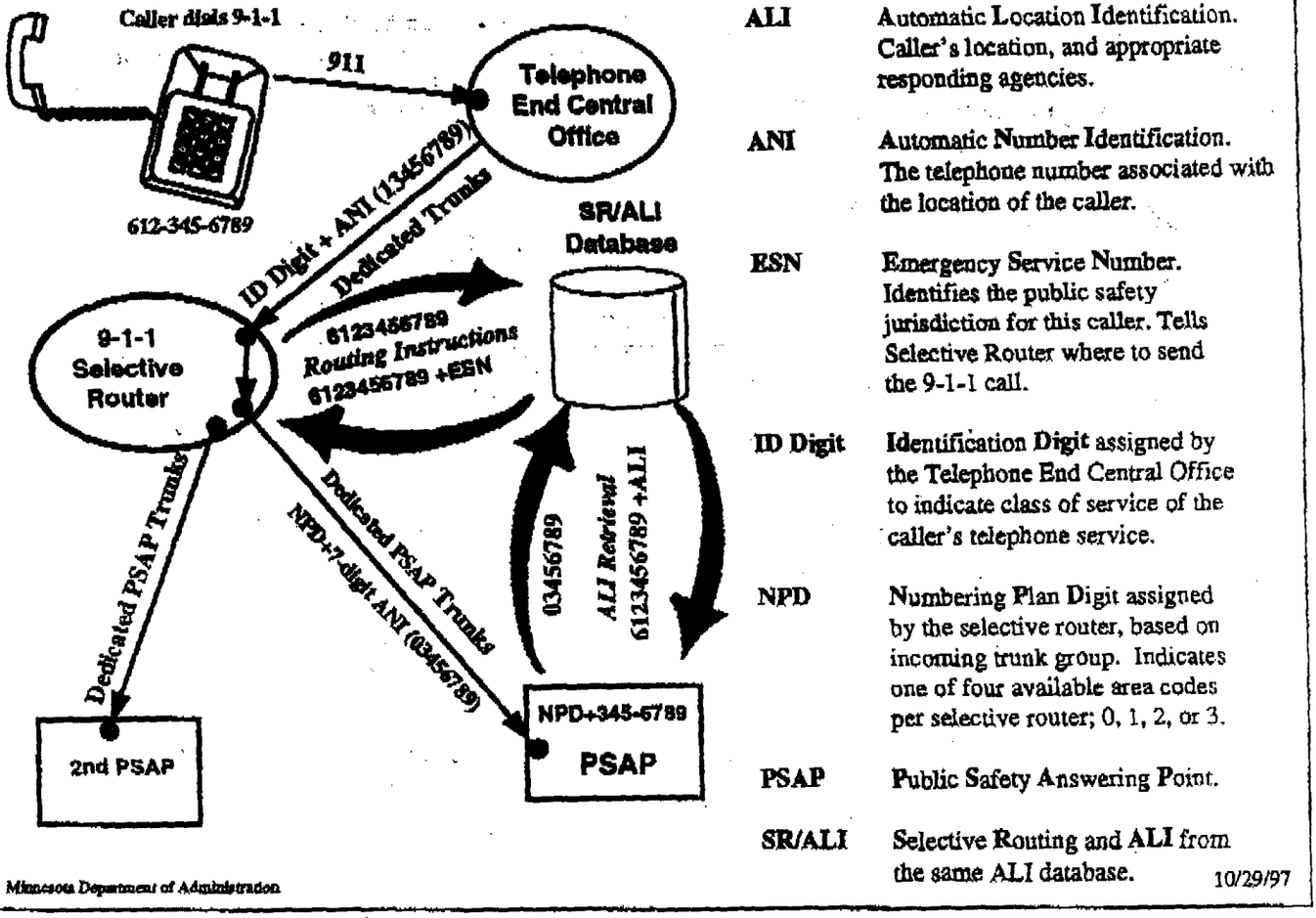
Aerial Communications

AT&T Wireless Services

Nextel Communications

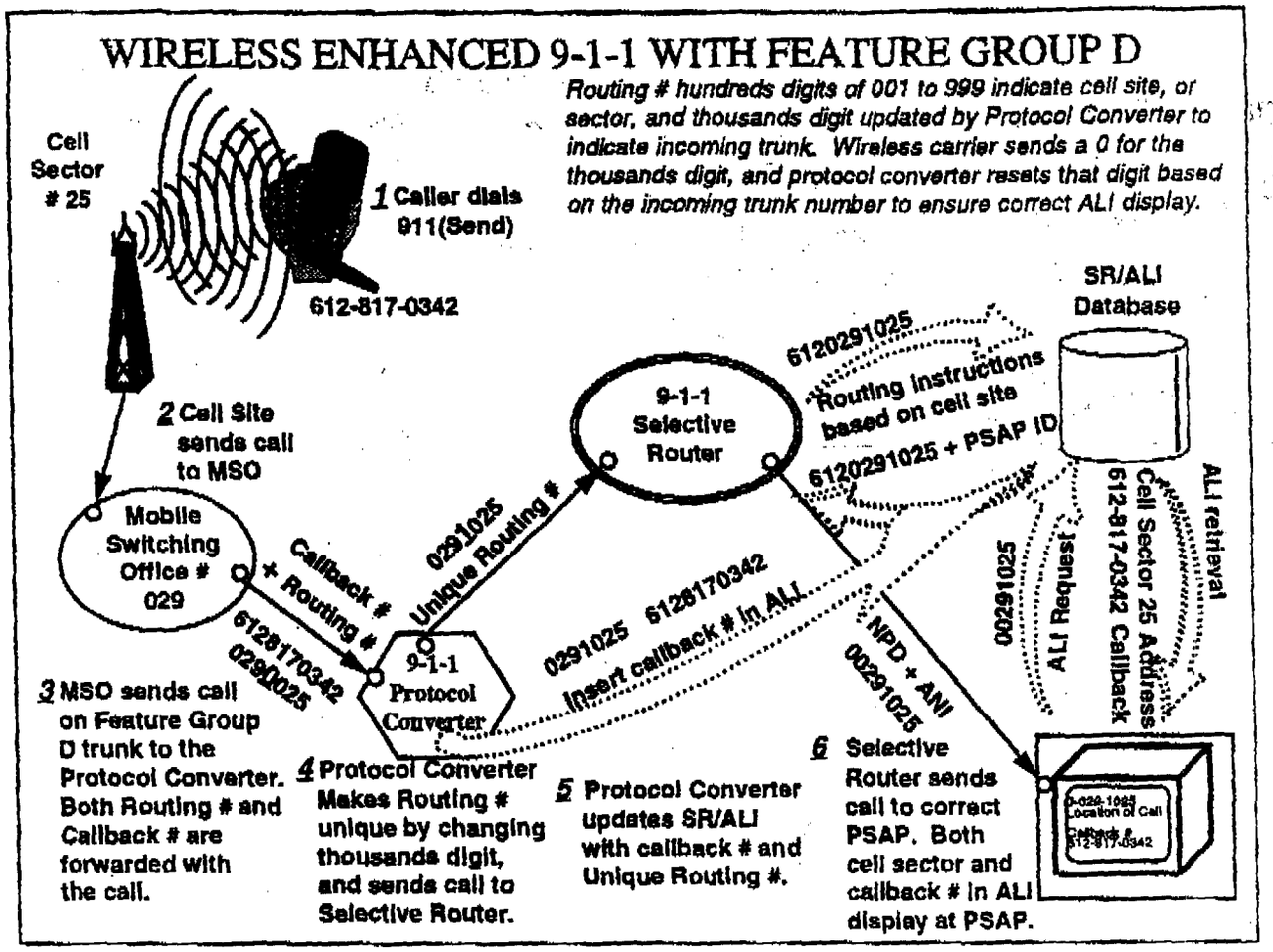
Sprint Spectrum (Sprint PCS)

U S West New Vector Group (AirTouch Cellular).



The enhanced 9-1-1 network in the Metropolitan area is provided by U S West under contract with Admin and the Metropolitan 911 Board, a joint powers board contracting on behalf of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington Counties. The Board paid for the installation charges and the Minnesota 9-1-1 Program pays the monthly recurring charges. The diagram shows this network architecture. This system uses the Lucent Model 5E Tandem Selective Router. The 5E is a digital switch, able to readily accommodate likely future Signaling System Seven (SS7) 9-1-1 networks. It also gets routing instructions directly from the ALI Host Storage Device, rather than from a separate routing file database, as used for the older technology 1AESS and DMS tandem selective routers. More accurate routing is possible with this arrangement, because routing is always synchronized with the ALI database.

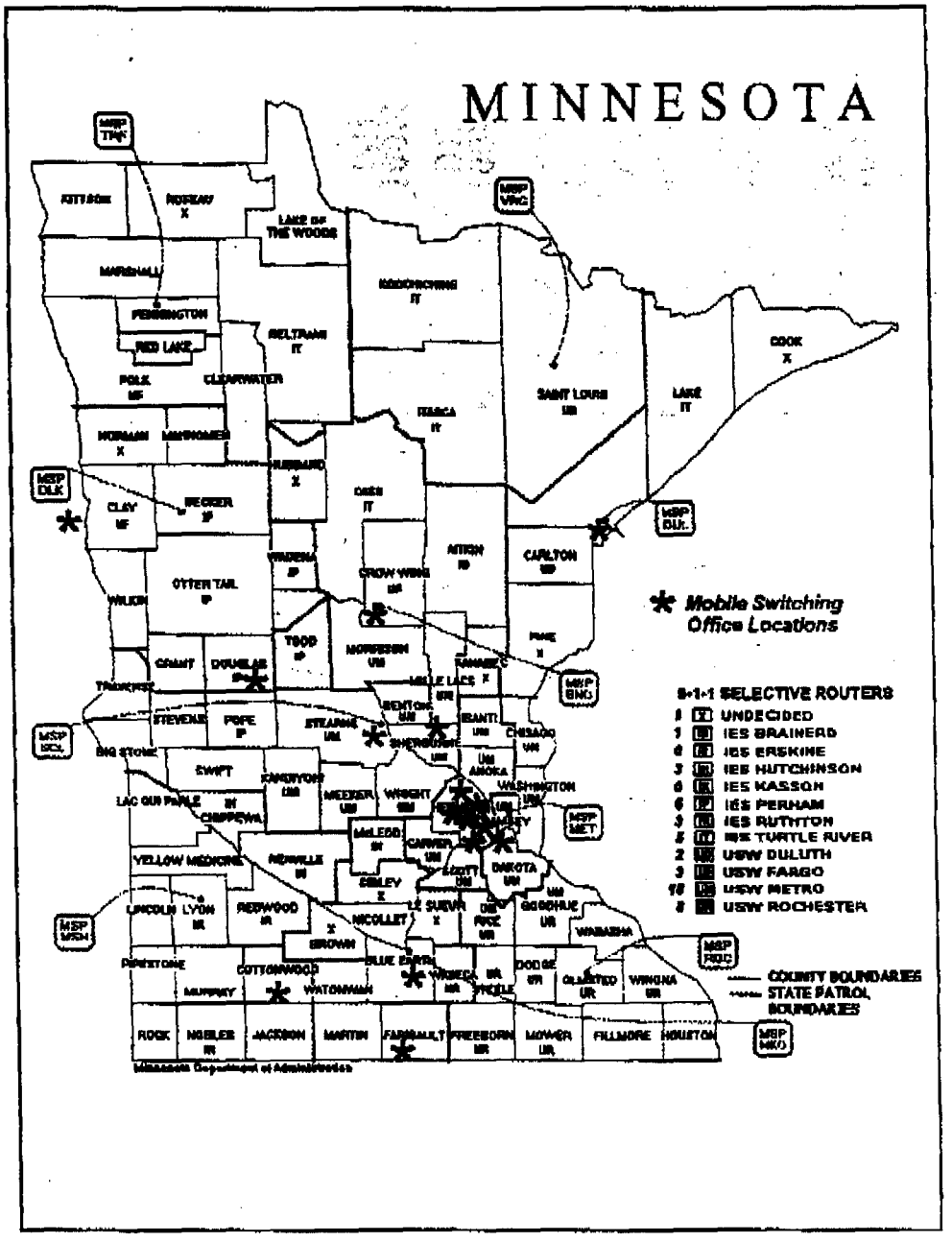
This is a simplified diagram. In actuality, there are two Selective Routers; a primary in Minneapolis (Downtown Central Office), and a Secondary in Saint Paul (Market Street Central Office).. Each Selective Router is equipped with half of the 9-1-1 trunks, so that loss of one selective router will still allow the 9-1-1 system to operate, albeit at somewhat reduced capacity. The database is also completely redundant.



Feature Group D (FGD) signaling is a proven technology already in use in Clark County and Seattle, Washington. FGD allows calls to be routed based on a Routing Number, without requiring us to install new networks or add to, modify or replace PSAP equipment. The FGD system allows two telephone numbers to be forwarded to the selective router, where a protocol converter intercepts the signal and sends the routing number to the tandem selective router and the caller's ten-digit callback number to the ALI database, where it is inserted into the record associated with the cell sector location. The selective router consults the ALI record to route the call, just as in all other enhanced 9-1-1 calls, and the call taker sees the familiar formats and content fields upon ALI retrieval and presentation. The converter allows real integration of wireless 9-1-1 calls into the enhanced 9-1-1 system.

A strong point of the Feature Group D application for enhanced wireless 9-1-1 is that the wireless access providers are only responsible for adding simple, consistent information to the call; the same Routing Number for each cell sector, and the caller's ten-digit Mobile Directory Number. The protocol converter manipulates the Routing Number as necessary to ensure that unique information is presented, even if there are multiple simultaneous 9-1-1 calls originating from the same cell site.

FGD allows integration into the enhanced 9-1-1 network using proven methods, and without immediate investment in unproven technology, which won't really be needed until the more precise Phase II location technology has matured. It is estimated that it can be accommodated within the 30-cent 9-1-1 fee limit.



Admin is working on the plan for the rest of the state at this time.
Things get much more complicated, with:

Fourteen wireless carriers

Sixteen MSOs

Two 9-1-1 service providers

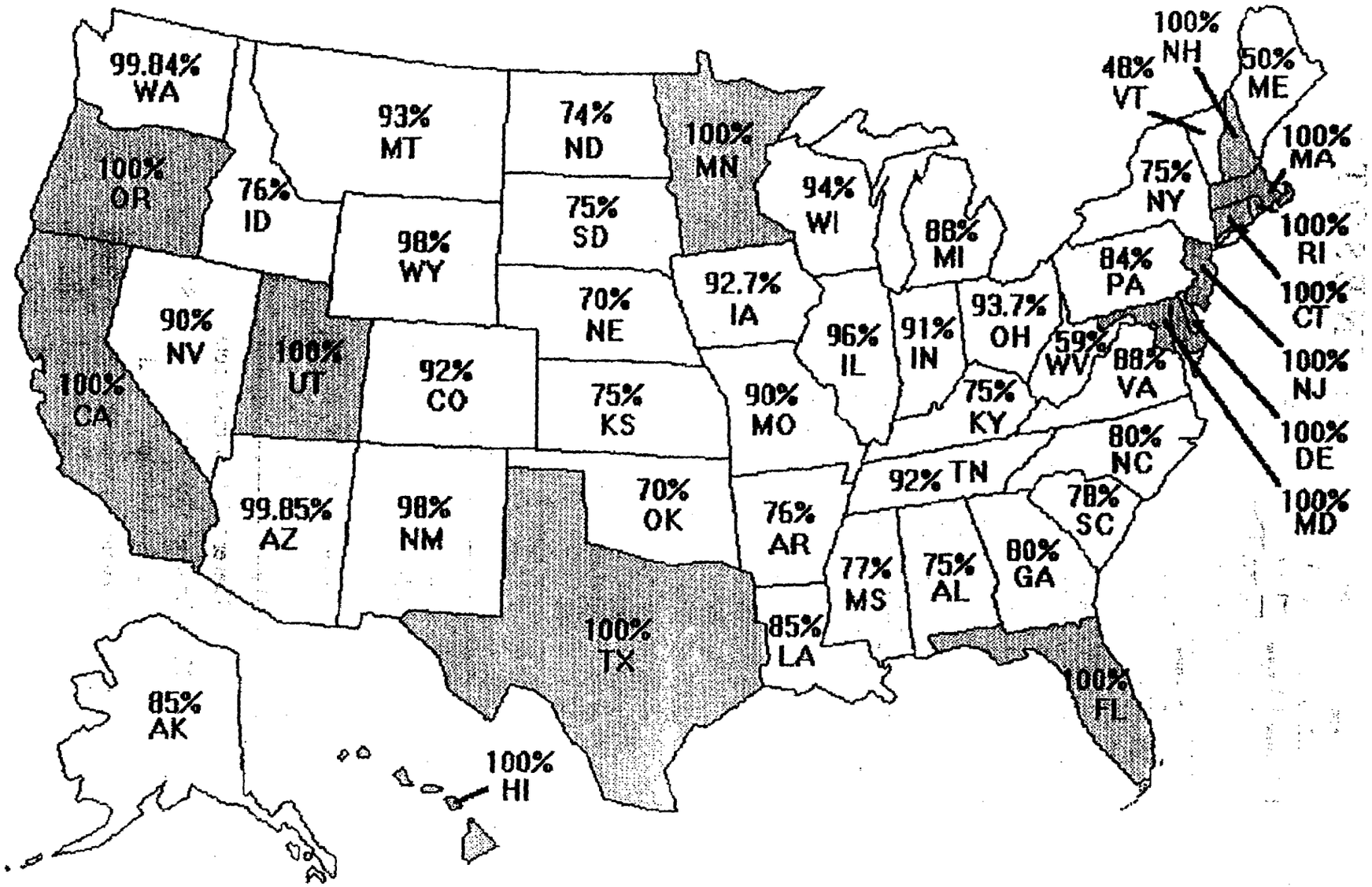
Eleven 9-1-1 selective routers

Nine Minnesota State Patrol District PSAPs

Forty-two county PSAPs

A 9-1-1 call volume of about 6,600 calls / month

91 % 9-1-1 COVERAGE IN THE UNITED STATES



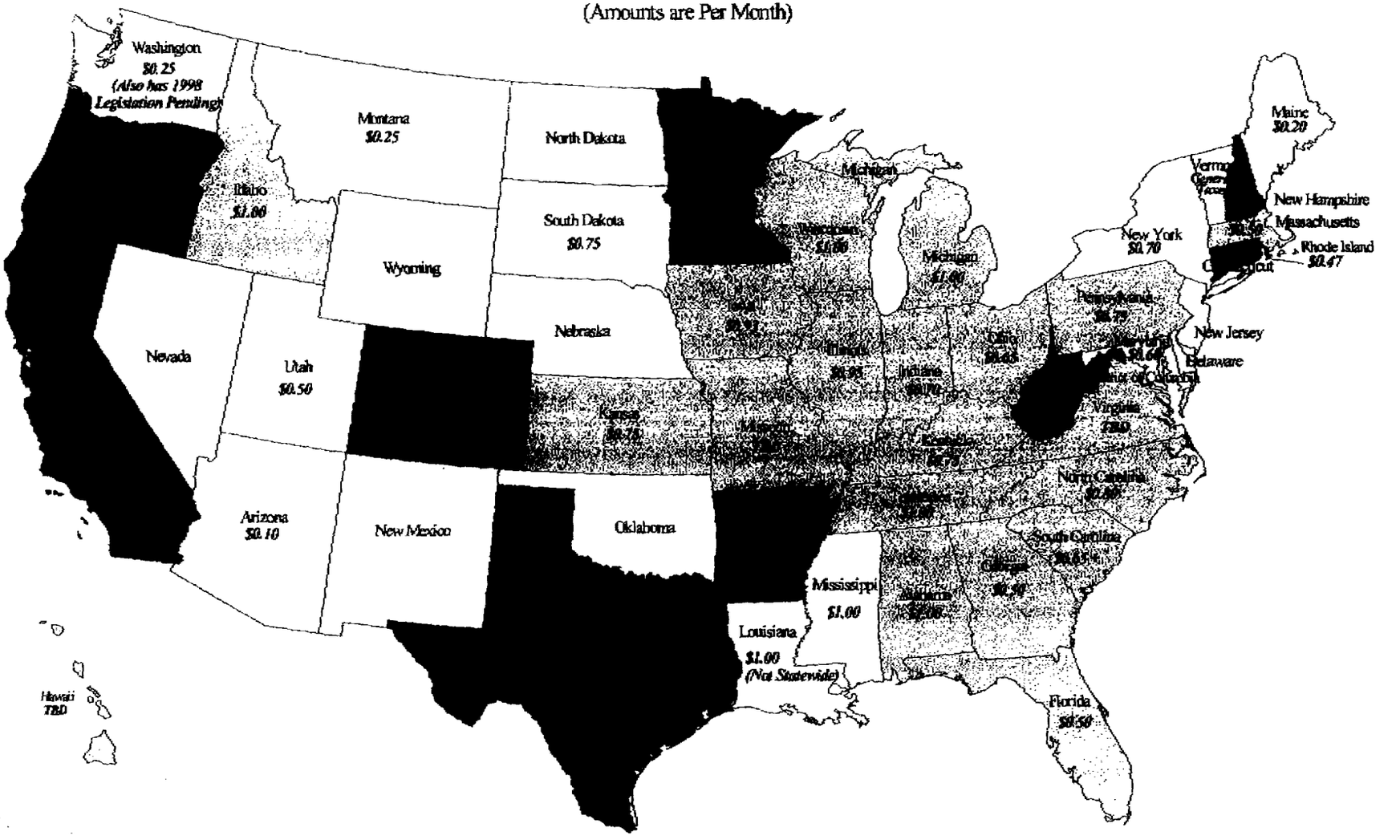
Minnesota Department of Administration

9/97

XYPOINT

Wireless E 9-1-1 Cost Recovery Status

(Amounts are Per Month)



Clear Wireless Carrier Cost Recovery

Limited Wireless Carrier Cost Recovery
Limited indicates that policy issues such as amount of surcharge, clarity of statute or administrative barriers remain for Wireless Carriers.

Anticipated 1998 Legislative Action on Cost Recovery

For More Information, Contact Reuven Carlyle at (206) 674 1056 or Tim Zenk at (206) 674 1278.

Prepared by T. Rohila November 17, 1997